

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

Arthur Paul Price
Debtor 1

Global Lending Services, LLC
Movant(s)

v.

Arthur Paul Price
Dawn Marie Dennis (Non-Filing Co-Debtor)
Respondent(s)

Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
Additional Respondent

Chapter 13

Case No. 5:24-BK-03095-MJC

Matter: Motion for Relief from the
Automatic Stay

Document No. 41

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Arthur Paul Price, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Paragraph 3 contains a conclusion of law to which no response is required.
4. Admitted.
5. Upon information and belief, the averment as stated in Paragraph 5 is admitted.
6. Upon information and belief, the averment as stated in Paragraph 6 is admitted.
7. Upon information and belief, the averment as stated in Paragraph 7 is admitted.
8. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment

as stated in Paragraph 8; therefore, it is denied.

9. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 9; therefore, it is denied.

10. Upon information and belief, the averment as stated in Paragraph 10 is admitted.

11. Paragraph 11 contains a conclusion of law to which no response is required.

12. Paragraph 12 contains a conclusion of law to which no response is required.

13. Paragraph 13 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: May 27, 2025

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
PA ID No. 201207
2132 Market Street
Camp Hill, PA 17011
(717) 975-9446
pmurphy@dplglaw.com
Attorney for Debtor(s)

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

Arthur Paul Price
Debtor 1

Global Lending Services, LLC
Movant(s)

v.

Arthur Paul Price
Dawn Marie Dennis (Non-Filing Co-Debtor)
Respondent(s)

Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
Additional Respondent

Chapter 13

Case No. 5:24-BK-03095-MJC

Matter: Motion for Relief from the
Automatic Stay

Document No. 41

CERTIFICATE OF SERVICE

I hereby certify that on Tuesday, May 27, 2025, I served a true and correct copy of the **Debtor(s)**' **Answer to Movant(s)**' **Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Brent Lemon, Esquire
Keri Ebeck, Esquire
BERNSTEIN-BURKLEY
601 Grant Street, Floor 9
Pittsburgh, PA 15219
Counsel for Movant(s)

Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Sylvia H. Rambo United States Courthouse
1501 North Sixth Street, Floor 3
Harrisburg, PA 17102

/s/ Kathryn S. Greene

Kathryn S. Greene, M-Jur., RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire